



DAVID YEGER LAW PLLC

July 19, 2021

VIA ECF

Hon. Valerie Caproni, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007

Re: *Mayweather Promotions, LLC v. PAC Entertainment Worldwide LLC;*
21-cv-4378 (VEC)

Dear Judge Caproni:

I was just retained as new counsel for PAC Entertainment Worldwide LLC, the defendant in the above-referenced action. I filed a Notice of Appearance this morning and will shortly be filing a formal substitution of counsel. I am writing pursuant to your Honor's Individual Practices to request a 2-week extension of Defendant's time to file its Answer to the Complaint. Defendant's response to the Complaint was originally due on June 10, 2021 and there have been two prior requests for extension made by Defendant's prior counsel.

Based on the current due date of July 22, 2021, the new proposed answer date would be August 5, 2021. This final request for an extension of this deadline is necessitated by my recent retention, and the time I require to consult with my client and investigate the matter in order to properly prepare Defendant's Answer. I have reviewed the Case Management Order entered by the Court on July 16, 2021 [ECF 23], and this request will not adversely impact the discovery end date set forth in the Order. Defendant does not intend to file a pre-answer motion to dismiss. Per my discussion with Michael Williams, plaintiff's counsel, plaintiff takes no position on this request.

Respectfully submitted,

/s/ *David Yeger*

David Yeger

cc: All counsel of record via ECF